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January 11, 2021

Via ECF

The Honorable Peggy Kuo, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Appelbaum et al v. World Class Business
Products Inc. 1:20-cv-04131(AMD)(PK)**

Dear Judge Kuo:

This firm represents the Trustees and Fiduciaries of the Retail, Wholesale and Department Store International Union and Industry Pension Fund, Plaintiffs in the above-referenced action. I am writing to provide a status report as directed by the Court in its Order of January 5, 2021.

We served the Complaint in this case on Defendant via the New York Secretary of State on September 11, 2020. Defendant has not answered or otherwise appeared in this case.

We are not certain what notices Defendant has received regarding its failure to make withdrawal liability payments. We are still in the process of attempting to locate Defendant's principal to re-send the notices.

By the end of March, we intend to seek the Court's leave to amend our complaint in order to seek the amounts due pursuant to ERISA Section 4219(c)(5), 29 U.S.C. § 1399(c)(5) in the event that Defendant defaults on its obligation by failing to cure its delinquent withdrawal liability payments within 60 days of receiving written notice from the plan sponsor of its failure to make such payments.

Thank you for your consideration.

Respectfully submitted,

/s/
Daniel Treiman